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June 10, 2021

By ECF

Hon. Sean H. Lane
United States Bankruptcy Judge
Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: In re: Suffern Partners LLC (the "Debtor"), Chapter 11 Case No. 21-22280(SHL)

Dear Judge Lane:

RS Old Mills RD, LLC ("RS Old Mills RD") retained us today with regard to the above-referenced bankruptcy case, which was commenced on May 16, 2021. We are writing to request an adjournment of the hearing on and the deadline for serving opposition to the above Debtor's motion, filed May 17, 2021, seeking authority to, among other things, assume a purchase and sale agreement and sell what is essentially the Debtor's only asset, a large commercial property located in the Town of Ramapo in Rockland County, New York, free and clear of RS Old Mills RD's interest therein. (the "Motion," ECF No. 7).

The hearing is set for Friday, June 18, 2021. The deadline for serving opposition is tomorrow, Friday, June 11, 2021. Earlier today, we asked Debtor's counsel to agree to a three (3) week adjournment of the hearing and objection deadline. Counsel responded that the Debtor cannot grant any adjournments.

The Debtor acquired the subject property from RS Old Mills RD, but RS Old Mills RD did not receive payment. More than one year ago, on March 9, 2020, the Debtor executed the subject purchase and sale agreement. Promptly thereafter, on April 14, 2020, RS Old Mills RD filed notices of lis pendens and commenced an action in New York Supreme Court, contending, among other things, that the sale must be rescinded because RS Old Mills RD did not receive the agreed \$30,000,000.00 purchase price. The Supreme Court has denied the Debtor's motions seeking dismissal of the action and cancellation of the notices of lis pendens, most recently by an order entered on April 13, 2021. Rather than litigate in state court, on May 16, 2021, the Debtor filed its petition in this Court and the next day filed the Motion and a notice of removal with regard to the state court action.

The Debtor is attempting to prosecute the Motion on a very expedited basis. The history of this matter is very complex and was the subject of a prior bankruptcy before this Court. The Motion purports to present the relevant history to the Court. But the Motion and the accompanying

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affidavit offer no citations or documents in support of the Debtor's account and misstate or omit what we believe are important facts. Our client's substantial objections will require additional time to properly present to the Court. Therefore, we respectfully request that the Court adjourn the Motion and the opposition deadline for three (3) weeks.

Respectfully,

A handwritten signature in black ink, appearing to read 'Shalom Jacob', with a long, sweeping horizontal line extending to the right.

Shalom Jacob

SJ:ahk

cc: Jonathan S. Pasternak (by email)
Robert L. Rattet (by email)